

Mark L. Smith (#14762)  
[msmith@smithwashburn.com](mailto:msmith@smithwashburn.com)  
Jacob L. Fannesbeck (#11961)  
[jfannesbeck@smithwashburn.com](mailto:jfannesbeck@smithwashburn.com)  
**SMITH WASHBURN, LLP**  
6871 Eastern Avenue., Suite 101  
Las Vegas, NV 89119  
Telephone: (725) 666-8701  
Facsimile: (725) 666-8710

*Attorneys for Reflex Media, Inc.*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REFLEX MEDIA, INC., a Nevada  
corporation,

Plaintiff,

v.

DOE NO. 1, an individual d/b/a  
[www.PredatorAlerts.com](http://www.PredatorAlerts.com), *et al.*,

Defendants.

Case No. 2:18-cv-02423-RFB-PAL

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT WEB PRESENCE, LLC TO  
RESPOND TO PLAINTIFF'S MOTION FOR  
ADDITIONAL TIME**

**(FIRST REQUEST)**

Pursuant to Civil L.R. 6-1, the parties hereby stipulate to an extension of time, first request, through and including February 5, 2019, for Defendant Web Presence, LLC d/b/a [www.NetReputation.com](http://www.NetReputation.com) ("Defendant") to respond to Plaintiff Reflex Media Inc.'s ("Plaintiff") Motion for Additional Time to Conduct Discovery re: The Identity of the Doe Defendants based on the following:

1. Plaintiff filed its Motion on January 15, 2019.
2. Defendant's response is currently due on or before January 29, 2019.
3. Undersigned counsel for Defendant is currently working to identify and retain local counsel to represent Defendant in this case.
4. Plaintiff and Defendant agree that in the interest of efficient case management, Defendant's time to respond to the Motion should and may be extended through and including February 5, 2019, which will provide Defendant sufficient time to retain local counsel and file the necessary appearances with the Court. Accordingly, Defendant's responsive pleading will now be due on or before February 5, 2019.

5. Plaintiff is filing this stipulation, as undersigned counsel for Defendant is not currently able to file documents in this matter until Defendant's counsel is admitted pro hac vice in Nevada District Court.

## ATTESTATION

I hereby attest that the concurrence in the filing of this document has been obtained by each of the signatories hereto.

Dated: January 29, 2019

SMITH WASHBURN, LLP

By: /s/ Mark L. Smith

Mark L. Smith

Attorneys for Plaintiff

REFLEX MEDIA, INC.

Dated: January 29, 2019

May, Potenza, Baran &amp; Gillespie, PC

By:/s/ Michelle Mozden

Michelle Mozden, Pro Hac Vice  
forthcoming

Christopher B. Ingle, Pro Hac Vice  
forthcoming

Attorneys for Defendant

WEB PRESENCE, LLC d/b/a

www.NetReputation.com

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that the Status and Scheduling Hearing as well as the Motion to Extend Discovery (ECF No. 64) which is currently scheduled for February 12, 2019 at 10:30 a.m., is **VACATED** and **CONTINUED** to February 19, 2019 at 2:00 p.m. in Courtroom 3B.

Dated: February 1, 2019

Tyger A. Green

Peggy A. Leen

United States Magistrate Judge

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2019, the foregoing **STIPULATION TO EXTEND TIME FOR DEFENDANT WEB PRESENCE, LLC TO RESPOND TO PLAINTIFF'S MOTION FOR ADDITIONAL TIME** was served on the person(s) named below via email:

Jacob Song,  
KUTAK ROCK LLP  
5 Park Plaza, Suite 1500  
Irvine, CA 92617-8595  
Email: jacob.song@kutakrock.com

Chad T. Nitta,  
Blair E. Kanis,  
KUTAK ROCK LLP  
1801 California Street, Suite 3000  
Denver, CO 80202  
Email: chad.nitta@kutakrock.com  
blair.kanis@kutakrock.com

*Attorneys for Marca Global, LLC*

Donald H. Cram  
Bernard J. Kornberg  
SEVERSON & WERSON  
One Embarcadero Center, Suite 2600  
San Francisco, California 94111  
Email: bjk@severson.com

Michelle L. Mozdzen  
Christopher Ingle  
MAY, POTENZA, BARAN & GILLESPIE, P.C.  
Chase Tower, 201 N. Central Ave., 22nd Floor  
Phoenix, AZ 85004  
Email: mmozdzen@maypotenza.com  
cingle@maypotenza.com

*Attorneys for Web Presence, LLC*

\_\_\_\_\_/s/ Leigh Davis-Schmidt